

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMIT PATEL,  
Plaintiff

**VS.**

**CON-WAY FREIGHT, INC., and  
RONALD K. BORDEN,  
Defendants**

)

CIVIL ACTION NO. 1:14-CV-13070

**AUTOMATIC RULE 26 DISCLOSURE OF  
THE PLAINTIFF, AMIT PATEL**

The Plaintiff, Amit Patel, hereby makes the following disclosure pursuant to Federal Rule of Civil Procedure 26(a)(1) and Local Rule 26.2:

### A. RULE 26(a)(1)(A)

In accordance with Rule 26(a)(1)(A), requiring disclosure of individuals likely to have discoverable information that may be used to support and defend claims at trial, the Plaintiff identifies the following, who are likely to have knowledge concerning the matter:

1. **Amit Patel**  
124 Bob O Link Circle  
Daytona Beach, FL 32114

Amit Patel has knowledge and details regarding the accident and injuries caused by the accident as well as events of the day in question.

2. Ronald K. Borden  
519 Washington Street, Apt. 1  
Coventry, RI 02816

Ronald K. Borden has knowledge and details regarding the accident and events of the day in question.

3. Jayantilal Patel  
124 Bob O Link Circle  
Daytona Beach, FL 32114

Jayantilal Patel has knowledge and details regarding events following the accident.

4. Kokilaten Patel  
124 Bob O Link Circle  
Daytona Beach, FL 32114

Kokilaten Patel has knowledge and details regarding events following the accident.

5. Methuen Police Officer Greco  
Norton Police Department  
82 East Main Street  
Norton, MA 02766

Officer Greco has knowledge of the details immediately following the accident and the ensuing investigation.

6. Medical Personnel  
Morton Hospital  
88 Washington Street  
Taunton, MA 02780  
(508) 828-7000

The medical personnel at Morton Hospital have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

7. Medical Personnel  
Priti Patel, M.D.  
233 Winthrop Street  
Taunton, MA 02780  
(508) 880-0700

Dr. Patel and staff have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

8. Medical Personnel  
Bay State Physical Therapy  
1054 County Street  
Somerset, MA 02726  
(508) 674-3340

The medical personnel at Bay State Physical Therapy have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

9. Medical Personnel  
Angels Neurological  
144 Dean Street  
Taunton, MA 02780  
(508) 828-1212

The medical personnel at Angels Neurological have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

10. Leslie Stern, M.D. and other medical personnel  
Truesdale Clinic  
1030 President Avenue  
Fall River, MA 02720  
(508) 676-3411

Dr. Stern and the medical personnel at Truesdale Clinic have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

11. Shalini Mansharamani, M.D. and other medical personnel  
Associates in Behavioral Health, LLC  
7 Dean Street  
Taunton, MA 02780  
(508) 822-0006

Dr. Mansharamani and the medical personnel at Associates in Behavioral Health, LLC have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

12. Bijan Niaki, M.D. and other medical personnel  
Taunton Regional Pain Management Center  
91 Washington Street, Suite 303  
Taunton, MA 02780  
(508) 824-1259

Dr. Niaki and the medical personnel at Taunton Regional Pain Management Center have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

13. Medical Personnel  
Joint Efforts Physical Therapy  
One Tremont Street  
Taunton, MA 02780  
(508) 824-1000

The medical personnel at Joint Efforts Physical Therapy have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

14. Andrew Mazur, M.D. and other medical personnel  
Southeast Rehabilitation Associates  
231 Weaver Street  
Fall River, MA 02720  
(508) 824-1259

Dr. Mazur and the medical personnel at Southeast Rehabilitation Associates have knowledge of the personal injuries Mr. Patel sustained as a result of the accident.

15. Personnel  
Con-way Freight, Inc.  
15 Southern Industrial Drive  
Cranston, RI 02921

Any and all employees, personnel, contractors and consultants with knowledge of the contract between defendant, Ronald K. Borden, and Con-way Freight, Inc. and what Mr. Borden's job description entailed, employee expectations are, his delivery route and his background check prior to hiring him.

As discovery has not yet been completed, the plaintiff reserves the right to supplement this section at a later date or call any witness at the time of trial.

**B. RULE 26(a)(1)(A)(ii)**

In accordance with Rule 26(a)(1)(A)(ii), requiring disclosure or description by category and location of documents that are in the possession, custody, or control of the plaintiff, and that the plaintiff may use to support claims, the plaintiff refers the parties to those documents, consisting of tangible items, documents maintained by counsel for the plaintiff, in accordance with the automatic disclosure requirements of Local Rule 26.2; the plaintiff will serve a privilege log with regard to documents withheld from same.

The plaintiff states that discoverable material regarding the issues addressed in section A (15) above (Con-way Freight, Inc. Employees) is in the possession of the defendant and subject to automatic disclosure and production by the defendant. The plaintiff further states that discoverable material concerning the matters set out in sections A (5-15) above are in the possession of the individuals identified. Plaintiff previously provided copies of all medical records and bills in their possession, along with photographs.

**C. RULE 26(a)(1)(A)(iii)**

General damages: Mr. Patel suffered multiple injuries including but not limited to significant injuries to his back, neck, groin and head as well as severe anxiety attacks and the consequent issues related to that. He has undergone years of physical therapy, injections and diagnostic testing to obtain relief of any ongoing nerve pain in the back, neck, groin and leg. Complete relief has never been achieved and damages/disability is ongoing.

Medical Expenses:   +\$ 86,537.31

Lost Wages:           Under evaluation

**D. Rule 26(a)(1)(A)(iv)-Liability Insurance Agreement**

See defendant statement.

Respectfully submitted  
Amit Patel  
By his attorney,

/s/ Peter E. Heppner

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Francis J. Lynch, BBO# 308740  
Peter E. Heppner, BBO # 559504  
Lynch & Lynch  
45 Bristol Drive  
South Easton, MA 02375  
508-230-2500  
508-230-2510 (Fax)  
pheppner@lynchlynch.com

I hereby certify that the attached document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants upon receipt of notification of same from the court.

/s/ Peter E. Heppner

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Peter E. Heppner, BBO # 559 504  
Lynch & Lynch  
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